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Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

ALASKA INDUSTRIAL DEVELOPMENT
AND EXPORT AUTHORITY,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, et
al.,

Defendants.

Case No. 3:24-cv-00282-SLG

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants Bureau of Land Management, et al., hereby move to further extend initial scheduling deadlines in this case as well as the related case *State of Alaska v. U.S. Department of the Interior*, No. 3:25-cv-00003-SLG. Both cases challenge the December 2024 Coastal Plain Oil and Gas Leasing Program Record of Decision (“2024 ROD”) selecting Alternative D2 from the November 2024 Final Coastal Plain Oil and Gas Leasing Program Supplemental Environmental Impact Statement (“SEIS”). *See* Compl. ¶

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1, ECF No. 1. Presently, the deadline to answer or otherwise respond to the complaint is April 25, 2025, and the deadline to file an administrative record is June 24, 2025. *See* Order, ECF No. 11.

Good cause exists to modify both of these deadlines. Following a change in administration, on January 20, 2025, President Trump issued Executive Order 14153 titled *Unleashing Alaska's Extraordinary Resource Potential*, 90 Fed. Reg. 8,347 (January 29, 2025), Section 3 of which directs heads of agencies to “exercise all lawful authority and discretion available to them” to take certain steps, including placing a “temporary moratorium” on, and conducting “review” of, the challenged 2024 ROD, and ultimately replacing the 2024 ROD. On February 3, 2025, Secretary Burgum issued Secretary’s Order 3422, also titled *Unleashing Alaska's Extraordinary Resource Potential*, which outlines a process for implementing the Executive Order. As part of its implementation process, the Department of the Interior has determined that it intends to issue a new ROD in the third quarter of 2025 based on the analysis and alternatives presented in the 2024 SEIS, and following reinitiation of consultation under Section 7 of the Endangered Species Act. It makes little sense to proceed on the current schedule preparing to address challenges to the 2024 ROD that, in a matter of months, is expected to be superseded by a new decision. An extension will conserve judicial resources and promote the efficient and orderly disposition of the case(s), including by ensuring that any litigation continuing before this Court will reflect operative agency action for management of the Coastal Plain Oil and Gas Leasing Program based on the Executive Order and Secretary’s Order.

In light of the foregoing, Defendants respectfully request that the Court issue an order extending the existing deadlines by ninety days, thus setting the deadline to answer or otherwise respond to the complaint on July 24, 2025, and the deadline to file the administrative record on September 22, 2025. A proposed order is submitted herewith.

Counsel have conferred, and Plaintiff does not oppose this motion.

Respectfully submitted.

DATED: April 18, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2025, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Paul A. Turcke
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